
**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES SHELTON,

Plaintiff,

v.

FAST ADVANCE FUNDING LLC,

Defendant.

Case No. 2:18-cv-02071-CFK

Honorable CHAD F. KENNEY

**DEFENDANT’S RULE 62(b) MOTION TO STAY EXECUTION ON JUDGMENT BY
PAYING MONEY INTO COURT PENDING APPEAL PROCESS**

COMES NOW Defendant, Fast Advance Funding LLC, and, pursuant to Federal Rule of Civil Procedure 62(b) moves this Court for an Order staying execution on the judgment entered in this Court in the amount of \$33,000.00 on May 8, 2019 in favor of Plaintiff, James Shelton.

Defendant would pay into the Court the following amount, for the benefit of Plaintiff in the event that Defendant exhausts its appeal rights and the judgment in Plaintiff’s favor still stands.

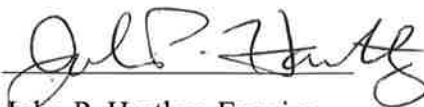
The amount to be paid into the Court would be as follows:

1. \$33,000.00 (the award)
2. \$3,960.00 (two years interest at six percent per annum)
3. \$666.88 (Plaintiff’s bill of costs)
4. \$700.00 (estimate of additional costs)

Total: \$38,326.88

WHEREFORE, Defendant respectfully requests that its present Motion be granted.

14
Date: June ~~15~~, 2019

By: 
John P. Hartley, Esquire
Attorney for Defendant

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CERTIFICATION OF SERVICE

I, Denise Devlin, Paralegal, hereby certify that on June 14, 2019, I caused true and correct copies of Defendant's Ruel 62(b) Motion For Stay Of Execution and the proposed Order to be served upon the persons and in the manners set forth below:

VIA FIRST CLASS MAIL, POSTAGE PREPAID and ELECTRONIC COURT FILING

Norman M. Valz, Esq.
490 Norristown Road
Suite 151
Blue Bell, PA 19422
Attorney for the Defendant

Bryan Anthony Reo
REO LAW, LLC
P.O. Box 5100
Mentor, OH 44061
Attorney for the Plaintiff

Date: June 14, 2019

By: Denise Devlin
Denise Devlin, *Paralegal*